

**EXHIBIT B**

Monthly Fee Statements

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET  
FOR THE PERIOD FROM APRIL 5, 2023 THROUGH MAY 31, 2023

Debtor: LTL Management LLC Applicant: Randi S. Ellis, FCR  
Case No.: 23-12825-MBK Client: N/A  
Chapter: 11 Case Filed: April 4, 2023 (the "Petition Date")

SECTION I  
FEE SUMMARY

☒ Monthly Fee Application No. 1 ☐ Final Fee Application

Summary of Amounts Requested for the Period from April 5, 2023 through May 31, 2023<sup>1</sup>.

Total Fees:	\$99,317.75
Total Disbursements:	\$1,288.72
Total Fees Plus Disbursements:	\$100,606.47
Minus 20% Holdback of Fees:	\$19,863.55
<b>Amount Sought at this Time:</b>	<b>\$80,742.92</b>

	<u>FEEs</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	\$0	\$0
Total Fees Allowed To Date:	\$0	\$0
Total Retainer (If Applicable):	N/A	N/A
Total Holdback (If Applicable):	\$0	\$0
Total Received To Date:	\$0	\$0

<sup>1</sup> The Applicant respectfully requests reimbursement of expenses incurred and fees for work performed for the period from the Petition Date through and including May 31, 2023.

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
Randi S. Ellis, Legal Representative for Future Talc Claimants	1997	104.8	\$1015/hr	\$99,317.75

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	28.8	\$29,232.00
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		

SERVICES RENDERED	HOURS	FEE
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.		
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.		
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	62.1	\$63,031.50
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		

SERVICES RENDERED	HOURS	FEE
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and brining accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b> Please note that non-working travel time must be billed at 50% of cost.	13.90	\$7,054.25
<b>SERVICE TOTALS:</b>	<b>104.80</b>	<b>\$99,317.75</b>

### SECTION III

#### SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) <b>Filing Fees</b> Payable to Clerk of Court.	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	
d) <b>Fax</b> Include per page fee charged.	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurint.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	\$1,288.72
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	
l) <b>Postage</b>	
m) <b>Other (specify)</b>	
<b>DISBURSEMENTS TOTALS:</b>	<b>\$1,288.72</b>

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2023

s/Randi S. Ellis

Randi S. Ellis

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23- 12825

Honorable Michael B. Kaplan

**MONTHLY FEE STATEMENT OF RANDI S. ELLIS,  
LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS,  
FOR THE PERIOD APRIL 5, 2023 THROUGH MAY 31, 2023**

Randi S. Ellis, Legal Representative for Future Talc Claimants (“FCR”) submits this Monthly Fee Statement for Services Rendered and Expenses Incurred as Legal Representative for Future Talc Claimants (the “Statement”) for the period commencing April 5, 2023 and ending May 31, 2023 (the “Statement Period”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [Dkt. No. 562] (the “Interim Compensation Order”). The date of the Order Appointing Randi S. Ellis as FCR is May 18, 2023 [Dkt. No. 551], effective as of April 10, 2023 (the “Appointment Order”). Paragraphs 2 and 5 of the Appointment Order, which is annexed as **Exhibit A**, permit payment of compensation to the FCR incurred on or after April 10, 2023. *See* Exhibit A.

The billing invoice for the Statement Period is annexed hereto as **Exhibit B**. This invoice details the services performed. A detailed breakdown of all out-of-pocket disbursements necessarily incurred by the FCR is included in the invoice annexed as **Exhibit B**. The fees and expense reimbursement sought in the within Statement Period is as follows:

<b>Total Fees</b>	<b>20% Holdback</b>	<b>Fee Payment Requested</b>	<b>Expense Reimbursement (100%)</b>
\$99,317.75	\$19,863.55	\$79,454.20	\$1,288.72



WHEREFORE, the FCR respectfully requests the interim payment of fees for this Statement Period in the sum \$79,454.20 (representing the amount of fees after a 20% holdback), together with expenses of \$1,288.72 for a total requested interim payment of \$80,742.92, in accordance with the terms of the Interim Compensation Order.

I certify under penalty of perjury that the foregoing is true correct.

Executed: June 16, 2023

Respectfully submitted,

s/Randi S. Ellis

Randi S. Ellis

*Legal Representative for Future Talc Claimants*

**EXHIBIT A**

Appointment Order



Order Filed on May 18, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
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**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
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gmgordon@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted *pro hac vice*)

**PROPOSED ATTORNEYS FOR DEBTOR**

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

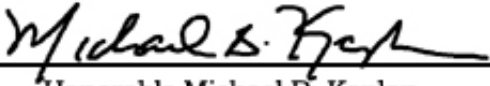
Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**ORDER APPOINTING RANDI S. ELLIS  
AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

The relief set forth on the following pages is hereby **ORDERED**.

**DATED: May 18, 2023**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

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Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

This matter coming before the Court on the *Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* [Dkt. 87] (the "Motion"),<sup>2</sup> filed by the debtor in the above-captioned case (the "Debtor") pursuant to sections 524(g)(4)(B) and 105(a) of the Bankruptcy Code; the Court having reviewed the Motion, the objections filed by the Official Committee of Talc Claimants [Dkt. 311], Paul Crouch [Dkt. 318], Maune Raichle Hartley French & Mudd, LLC [Dkt. 320], and the United States Trustee [Dkt. 321] (collectively, the "Objections"), the supplemental declaration [Dkt. 354] and amended supplemental declaration filed by Ms. Ellis [Dkt. 415], the Debtor's reply in support of the Motion [Dkt. 355] and the responses to Ms. Ellis' amended supplemental declaration filed by the Official Committee of Talc Claimants [Dkt. 436] and Maune Raichle Hartley French & Mudd, LLC [Dkt. 438], and having heard the statements of counsel and considered the evidence presented with respect to the Motion at a hearing before the Court on May 3, 2023 (the "Hearing"); the Court finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b) and 1334 and the Standing Order of Reference, (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iv) notice of the Motion and the Hearing was sufficient under the circumstances and (v) the relief requested in the Motion is in the best interests of the Debtor, its estate and its creditors; and after due deliberation and for the reasons set forth by the Court on the record during the May 9, 2023 hearing, the Court having overruled the Objections and

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

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Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED to the extent set forth herein.
2. Pursuant to sections 524(g)(4)(B)(i) and 105(a) of the Bankruptcy Code, Randi S. Ellis is hereby appointed as the Future Claimants' Representative to represent and protect the rights of, absent further order of the Court, natural persons or the representatives of estates of natural persons, including those in Canada or in the United States, that may assert a demand for payment, present or future, that: (a) is not a claim during the proceedings prior to the entry of an order confirming a plan of reorganization (the "Plan"), because such natural person was diagnosed with disease after such time; and (b) arises out of the same or similar conduct or events that gave rise to the claims to be addressed by an injunction issued to enjoin entities from taking legal action for the purpose of directly or indirectly collecting, recovering or receiving payment or recovery with respect to any claim or demand that, under the Plan, is to be paid in whole or in part by a trust established pursuant to section 524(g)(2)(B)(i) and/or 105(a) of the Bankruptcy Code (collectively, the "Future Claimants"). The Future Claimants' Representative shall represent the interests of, appear and act on behalf of, and be a fiduciary to Future Claimants to protect the rights and interests of such Future Claimants and shall be entitled to compensation in connection therewith from the date of the filing of the Motion. Ms. Ellis will have no other obligations except those that may be prescribed by orders of the Court and accepted by Ms. Ellis.

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Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

3. The Future Claimants' Representative shall be a party in interest in this Chapter 11 Case and shall have standing under section 1109(b) of the Bankruptcy Code to be heard on any issue in this case in the Bankruptcy Court, the District Court or any other court affecting the rights of Future Claimants. The Future Claimants' Representative shall have the powers and duties of a committee set forth in section 1103 of the Bankruptcy Code as are appropriate for a Future Claimants' Representative.

4. In her role as the Future Claimants' Representative, Ms. Ellis may employ attorneys and other professionals consistent with sections 105, 327, and 1103 of the Bankruptcy Code, subject to prior approval of this Court, and such attorneys and other professionals shall be subject to the terms of any Interim Compensation Order.

5. Compensation, including professional fees and reimbursement of actual and necessary expenses, shall be payable to Ms. Ellis and her professionals from the Debtor's estate, as appropriate, subject to approval of this Court, and in accordance with the terms, conditions and procedures set forth in the Interim Compensation Order. In her role as the Future Claimants' Representative, Ms. Ellis shall be compensated at the rate of \$1,015 per hour, subject to periodic adjustment (usually on January 1 of each year) in the ordinary course of her business, plus reimbursement of actual, reasonable and documented out-of-pocket expenses.

6. The Future Claimants' Representative shall not be liable for any damages, or have any obligation other than as prescribed by order of the Court; provided, however, that the Future Claimants' Representative may be liable for damages caused by willful misconduct or gross negligence. The Future Claimants' Representative shall not be liable to any person as a

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Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

result of any action or omission taken or made in good faith. The Debtor shall indemnify, defend, and hold harmless Ms. Ellis, her employees and professionals (individually an “Indemnified Party”) from all claims against any of them, and all losses, claims, damages or liabilities (or actions in respect thereof) to which any of them may become subject, as a result of or in connection with such party rendering services pursuant to this Order or to the Future Claimants’ Representative, unless and until it is finally judicially determined that such losses, claims, damages or liabilities were caused by willful misconduct or gross negligence on the part of such Indemnified Party. If before the earlier of (i) the entry of an order confirming a plan of reorganization in this case, and such order having become final and no longer subject to appeal, and (ii) the entry of an order closing this Chapter 11 Case, an Indemnified Party believes that he, she or it is entitled to payment of any amount by the Debtor on account of the Debtor’s obligations to indemnify, defend and hold harmless as set forth herein, including, without limitation, the advancement of defense costs, the Indemnified Party must file an application for such amounts with the Court, and the Debtor may not pay any such amounts to the Indemnified Party before the entry of an order by the Court authorizing such payments. The preceding sentence is intended to specify the period of time during which the Court has jurisdiction over the Debtor’s obligations to indemnify, defend and hold harmless as set forth herein, and is not a limitation on the duration of the Debtor’s obligation to indemnify any Indemnified Party. In the event that a cause of action is asserted against any Indemnified Party arising out of or relating to the performance of his, her or its duties pursuant to this Order or to the Future Claimants’ Representative, the Indemnified Party shall have the right to choose his, her or its own counsel.

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Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

For the avoidance of doubt, gross negligence, willful misconduct, bad faith or fraud on the part of one Indemnified Party shall not preclude indemnification for the other Indemnified Parties.

Any such indemnification shall be an allowed administrative expense under section 503(b) of the Bankruptcy Code and shall be paid upon application to and approval of this Court.

7. Ms. Ellis and any Court-approved counsel retained by Ms. Ellis in her role as Future Claimants' Representative shall be deemed members of the "Core Service List" (or equivalent thereof) for purposes of any Case Management Procedures.

8. Unless otherwise ordered by this Court or as provided for in any confirmed plan of reorganization, Ms. Ellis' appointment as Future Claimants' Representative shall terminate upon the effective date of a plan of reorganization in this Chapter 11 Case or otherwise by written resignation or incapacity to serve.

9. The Debtor shall pay the Future Claimants' Representative Liability Insurance, the cost of which is expected to be approximately \$100,000 per year without further Court approval.

10. The requirement set forth in D.N.J. LBR 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

11. The Debtor is hereby authorized to take all actions it deems necessary to effectuate the relief granted in this Order.

12. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.



**EXHIBIT B**

Time and Expense Invoice

**ATTORNEY AT LAW\***  
(A LIMITED LIABILITY COMPANY)

EMAIL: RANDI@RANDIELLIS.COM

\*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court  
District of New Jersey  
402 East State Street  
Trenton, NJ 08608

June 06, 2023  
Client: 001000  
Matter: 000001  
Invoice #: 160  
Resp. Atty: LMW  
Page: 1

RE: In Re: LTL Management, LLC  
Case No.: 23-12825-MBK  
Judge: Michael B. Kaplan  
Chapter: 11

For Professional Services Rendered Through May 31, 2023

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
4/5/2023	RE	B200	Review of Court order entering TRO and stay of Valdez trial (.1); review of Order Setting First Day Hearing (.1); review opposition by MR to FCR Motion to Appointment (.3); communications with counsel regarding same (.3).	0.8	\$1,015.00	\$812.00
4/6/2023	RE	B200	Communications with counsel regarding objection filed by MR (.6); review draft letter in response to the MR objection (.1); approve letter filed in response to MR objection (.1); prepare and revise declaration for Appointment as FCR (.4); communications with counsel regarding Motion and declaration (.3).	1.5	\$1,015.00	\$1,522.50
4/7/2023	RE	B200	Review and revise FCR declaration.	0.3	\$1,015.00	\$304.50
4/8/2023	RE	B200	Review and edits to Motion to Appoint FCR and declaration.	0.2	\$1,015.00	\$203.00
4/10/2023	RE	B200	Review of final Motion to Appoint FCR (.1); review of Valadez Motion for Relief from Stay (.1); review of Meso Claimants' Opposition to Debtor's Motion to File List of Top Law Firms (.1); review of Ad Hoc Committee's Informational Brief (.2); review of Maune Raichle's Statement Against Second Bankruptcy and Joinder of Ad Hoc Committee's Informational Brief (.1).	0.6	\$1,015.00	\$609.00

June 06, 2023

Client: 001000  
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Invoice #: 160  
Resp. Atty: LMW  
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## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
4/11/2023	RE	B200	Review of Ad Hoc Committee's Objection to Debtor's First Day Relief (.1); review of Meso's Joinder Opposing Debtor's Motion to File Law Firms (.1); review of Maune Raichle Joinder to AHC's Objection to Debtor's First Day Relief (.1).	0.3	\$1,015.00	\$304.50
4/11/2023	RE	B140	Attend hearing via zoom.	6.0	\$1,015.00	\$6,090.00
4/13/2023	RE	B200	Review of Orders Suspending Standard Notice of Commencement, Granting Complex Chapter 11 Case Designation, and Setting hearings.	0.3	\$1,015.00	\$304.50
4/14/2023	RE	B200	Review of Notice of Agenda for April 18, 2023 hearing.	0.1	\$1,015.00	\$101.50
4/16/2023	RE	B200	Review of US Trustee's Notice of Appointment of TCC.	0.1	\$1,015.00	\$101.50
4/17/2023	RE	B200	Review of Reply to Debtor's "Oral Objections" to Valadez Motion for Stay Relief (.1); review of Debtor's Notice of Filing of List of Creditors (.1); review of Debtor's Objection to Motion Seeking Relief from Auto Stay, TRO, Injunction (.2); review of Revised Agenda for Hearing set for tomorrow (.1).	0.5	\$1,015.00	\$507.50
4/18/2023	RE	B140	Attend hearing by zoom.	9.0	\$1,015.00	\$9,135.00
4/19/2023	RE	B200	Review of Notice of Commencement of Chapter 11 Case (.1); review of Order Authorizing Debtor to File List of Law Firms (.1).	0.2	\$1,015.00	\$203.00
4/24/2023	RE	B200	Review of OCTC's Motion to Dismiss Bankruptcy (.2); review of OCTC's Motion to Seal (.1).	0.3	\$1,015.00	\$304.50
4/26/2023	RE	B200	Review of TCC's opposition to FCR appointment (.2); communications with counsel regarding objection by TCC (.3); review of Paul Crouch Objection to Debtor's Motion Appointing Randi Ellis as FCR (.2); review of Debtor's Motion Authorizing Debtor to Satisfy Obligations Under Prior Dismissal Order (.1); review of MR Objection to FCR (.2); review of US Trustee Objection to FCR (.1).	1.1	\$1,015.00	\$1,116.50
4/27/2023	RE	B200	Drafting and revising Supplemental Certification in Support of FCR Appointment (.8); communications with counsel regarding same and pending matters (.6); analyze Unredacted Objection to FCR by US Trustee (.2); analyze Unredacted Objection to FCR by TCC (.3); review of materials in support of FCR appointment (1.2); review of AHC of Meso's Motion to Certify Direct Appeal as to Kaplan's Preliminary Injunction Order (.1).	3.2	\$1,015.00	\$3,248.00

June 06, 2023

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Resp. Atty: LMW  
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## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
4/28/2023	RE	B200	Communications with counsel regarding next steps (.6); revising Supplemental Declaration in Support of Application for FCR (1.4).	2.0	\$1,015.00	\$2,030.00
4/30/2023	RE	B200	Review of Debtor's Omnibus Reply to Application to Appoint Randi Ellis (.3); review of MR Firm's Motion to Dismiss New LTL Bankruptcy (.1); review of Letter to counsel regarding subpoena and document production (.1); communications with counsel regarding document production (.4)search for documents(3.1).	4.0	\$1,015.00	\$4,060.00
5/1/2023	RE	B200	Review of Debtor's Letter to Kaplan as to Common Interest Privilege and Motions to Dismiss (.1); review of Notice of Agenda for May 3, 2023 Hearing (.1); drafting answers to discovery (.8); communications with counsel regarding same (.3).	1.3	\$1,015.00	\$1,319.50
5/2/2023	RE	B200	Review of US Trustee's Motion to Dismiss (.3); review of Arnold & Itkin Motion to Dismiss (.2); review of TCC's Notice of Filing of Writ of Mandamus (.1); review of Brown Rudnick Letter to Judge Kaplan in response to Debtor's letter of May 1, 2023 (.1); review of Valadez' Supplemental Request for Stay Relief (.1); review of Supplemental Declaration of John Kim (.1); search for documents responsive to the subpoenas(2.8) communications with counsel regarding Debtor's document production and review of same (.5).	4.2	\$1,015.00	\$4,263.00
5/2/2023	RE	B195	Travel from Houston to New Jersey to attend May 3, 2023 hearing.	6.2	\$507.50	\$3,146.50
5/3/2023	RE	B200	Meetings with counsel before and after May 3, 2023 hearing.	3.0	\$1,015.00	\$3,045.00
5/3/2023	RE	B140	Attend May 3, 2023 Hearing.	4.5	\$1,015.00	\$4,567.50
5/3/2023	RE	B195	Return Travel to Houston after May 3 hearing in Trenton.	7.7	\$507.50	\$3,907.75
5/4/2023	RE	B200	Draft, revise, and finalize Amended Certification FCR (.5); communications with counsel regarding next steps (.8).	1.3	\$1,015.00	\$1,319.50
5/5/2023	RE	B200	Review of MRHFM's Response to Ms. Ellis' Amended Supplemental Declaration (.1); communications with counsel regarding same (.2).	0.3	\$1,015.00	\$304.50
5/6/2023	RE	B200	Review of Paul Crouch Objection to Gary Russo as Mediator (.1); communications with mediator regarding same (.3).	0.4	\$1,015.00	\$406.00

June 06, 2023

Client: 001000  
Matter: 000001  
Invoice #: 160  
Resp. Atty: LMW  
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## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/7/2023	RE	B200	Review of Maune Raichle's Objection to Debtor's Motion for Hearing on Disclosure Statement (.1); review of Statement of Assets and Liabilities of LTL Management LLC (.1).	0.2	\$1,015.00	\$203.00
5/8/2023	RE	B200	Review of Debtor's Response to Petition for Writ of Mandamus (.1); review of AHC of Supporting Firms' Response to Petition for Writ of Mandamus (.1); review of Maune Raichle's Objection to Gary Russo as Mediator (.1); review of Order Appointing Co-Mediators (.1); review of US Trustee's Motion to Compel (.1); review of Notice of Agenda and revised Notice of Agenda (.1); communications with mediators regarding next steps (.6).	1.2	\$1,015.00	\$1,218.00
5/9/2023	RE	B140	Attend hearing by zoom Ruling on FCR Motion.	4.5	\$1,015.00	\$4,567.50
5/9/2023	RE	B200	Communications with counsel regarding next steps (.4); review of Third Circuit Order Denying Petition for Writ of Mandamus (.1); review of Third Circuit Order Partially Denying Motion to Seal Petition Appendices (.1); review of Georgia State Court Claimants' Joinder to Motions to Dismiss (.1); review of AHC of Supporting Law Firms Rule 2019 Statement and Exhibits (.3).	1.0	\$1,015.00	\$1,015.00
5/10/2023	RE	B200	Communications with counsel regarding next steps (1.0); review of revised proposed order confirming FCR Appointment (.1); review of Text Order on May 16 Hearing (.1).	1.2	\$1,015.00	\$1,218.00
5/11/2023	RE	B200	Review of New Mexico and Mississippi Motion to Dismiss and Joinder (.2); review of TCC's Reservation of Rights as to Debtor's Retention of Professionals (.1); communications with counsel regarding status of Proposed Order Appointing FCR and next steps (.9).	1.2	\$1,015.00	\$1,218.00
5/12/2023	RE	B200	Review of AHC of States with Consumer Claims Verified 2019 Statement (.1); review of TCC's Motion to Commence and Prosecute Certain Claims (.1); review of MR Firm's Joinder to TCC's Reservation of Rights as to Debtor's Retention of Professionals (.1).	0.3	\$1,015.00	\$304.50
5/13/2023	RE	B200	Debtor's Cross-Motion for Protective Order (.1); review of TCC (Brown Rudnick) Letter as to Motions to Dismiss Scheduling (.1); review of Debtor's Omnibus ROR as to TCC Applications to Retain Professionals (.1); review of Debtor's Response Letter to TCC and Discovery Matters (.1); review of AHC of Supporting Firms' Objection to TCC's Cross-Motion Suspending Bankruptcy (.2); review of AHC of Supporting Firms' Reply as to Scheduling Motion (.1).	0.7	\$1,015.00	\$710.50

Client: 001000  
Matter: 000001  
Invoice #: 160  
Resp. Atty: LMW  
Page: 5

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/14/2023	RE	B200	Review of Debtor's Reply to Motion for Hearing on Disclosure Statement (.1); review of Debtor's Reply to TCC's Cross-Motion to Suspend Bankruptcy (.1); review of Notice of Agenda for Hearing May 16, 2023 (.1); review of TCC's Motion to Compel (.2).	0.5	\$1,015.00	\$507.50
5/15/2023	RE	B200	Review of Transcript of 341 Meeting of Creditors (1.7); review of pleadings filed and set for May 16 hearing (.6); communications with counsel regarding next steps (.4).	2.7	\$1,015.00	\$2,740.50
5/16/2023	RE	B200	Review of Debtor's Response to Objections to Confidentiality Designations (.1); review of Debtor's Objection to TCC's Motion to Compel (.1); communications with counsel after zoom hearing to discuss next steps (.3).	0.5	\$1,015.00	\$507.50
5/16/2023	RE	B140	Attend Zoom Hearing.	3.5	\$1,015.00	\$3,552.50
5/17/2023	RE	B200	Initial Review of filed plan and disclosures filed with the Court on May 16, 2023 (3.8); communications with counsel regarding next steps (.4); call with counsel regarding next steps (.5); review of draft Application, proposed order, and certification for Retention of Walsh (.3); review of Order Denying TCC's Cross-Motion to Suspend (.1); review of Order Denying Motion to De-Designate Term Sheet Exhibit (.1); review of Order Governing Confidential Information as to TCC and Debtor (.2); review of Order Denying Debtor's Cross-Motion for Protective Order (.1); review of TCC's Several Professional Retention Applications (.2).	5.7	\$1,015.00	\$5,785.50
5/18/2023	RE	B200	Continued Review of filed plan and disclosures filed with the Court on May 16, 2023 (4.5); review of TCC's Corporate Disclosure Statement (.1); review of proposed case management order (.1); communications with counsel regarding proposed case management and next steps (.3); review of Order appointing FCR (.1); review of Final Application to Retain WPOF for FCR (.1); review of Text Orders on Scheduling and Appearances (.1).	5.3	\$1,015.00	\$5,379.50
5/19/2023	RE	B200	Communications with counsel regarding next steps (.2); analyze Debtor's filed Disclosures (1.8).	2.0	\$1,015.00	\$2,030.00

June 06, 2023

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Invoice #: 160  
Resp. Atty: LMW  
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## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/22/2023	RE	B200	Review of the following Court's Order Establishing Compensation Procedures filings expert Docket entries on Motion Rescheduling (.1); review of Arnold & Itkin's Motion to Seal (.1); review of Debtor's option to Satisfy Obligations under Dismissal Order (.1); TCC's Motion to Seal (.1); MR Firm's Motion for Direct Appeal WITHDRAWN (.1); review of Monthly Operating Report (.1).	0.6	\$1,015.00	\$609.00
5/23/2023	RE	B200	Review of Order Authorizing Debtor to Satisfy Obligations (.1); communications with counsel regarding next steps (.2).	0.3	\$1,015.00	\$304.50
5/24/2023	RE	B200	Review of Debtor's Motion to Enter Expense Agreement with AHC of Supporting Firms (.1); review of Docket Entries Extending US Trustee's Objection Deadline to Applications to Retain Professionals (.1); review of Order Granting Debtor's Motion to Seal (.1).	0.3	\$1,015.00	\$304.50
5/25/2023	RE	B200	Review of Debtor's response and revised response to the Official Committee of Talc Claimants' letter to the Court, dated May 25, 2023.	0.2	\$1,015.00	\$203.00
5/26/2023	RE	B200	Zoom with counsel and mediators (.8); review of Appeal Notice of FCR appointment (.1); call with counsel regarding next steps and filings regarding review of counsel billing and expenses (.3); review of MR filing regarding objecting to Walsh retention (.1).	1.3	\$1,015.00	\$1,319.50
5/27/2023	RE	B200	Review, edit, and approve filings for Walsh retention (.2); communications with counsel regarding Walsh retention filing (.2); analyze Debtor's filed plan and filings regarding same (4.4).	4.8	\$1,015.00	\$4,872.00
5/29/2023	RE	B200	Review of letter and exhibits filed by TCC to the Court regarding MTC, Debtor's time records and funding agreement.	0.5	\$1,015.00	\$507.50
5/30/2023	RE	B140	Attending Omnibus zoom hearing before J. Kaplan.	1.3	\$1,015.00	\$1,319.50
5/30/2023	RE	B200	Communications with counsel regarding experts (.3); analyze 2nd Circuit decision and concurrence in Re: Purdue Pharma (1.3); review J&J Parties' Reply ISO Motion for Entry of Protective Order (.1); review of WPOF Letter Response to Objection to Application for Retention (.1).	1.8	\$1,015.00	\$1,827.00

Client: 001000  
Matter: 000001  
Invoice #: 160  
Resp. Atty: LMW  
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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/31/2023	RE	B200	Communications from and to M. Shakra regarding Canadian counsel (.1); communications with counsel regarding next steps (.6); communications from and to mediators regarding update and next meeting (.2); analyze plan and debtor's filing regarding same (2.8); review of Motion to Shorten Time Regarding Debtor's Motion for Bridge Order Confirming Automatic Stay Applies to Certain Actions (.1).	3.8	\$1,015.00	\$3,857.00
Total Professional Services				104.8		\$99,317.75

**PERSON RECAP**

Person	Hours	Rate	Amount
RE Randi Ellis	13.9	\$507.50	\$7,054.25
RE Randi Ellis	90.9	\$1,015.00	\$92,263.50

**EXPENSES**

Date	Task	Description of Expenses	Amount
5/1/2023	E100 - E110	Airfare - Houston to Newark for 05-03-2023 hearing	\$507.80
5/2/2023	E100 - E109	Alto Receipt - Transportation to airport for hearing	\$131.36
5/3/2023	E100 - E109	Alto Receipt - Transportation from airport to home	\$98.12
5/3/2023	E100 - E110	Hotel - For 05-03-2023 hearing	\$551.44
Total Expenses			\$1,288.72

Total Services	\$99,317.75
Total Disbursements	\$1,288.72
Total Current Charges	\$100,606.47

**PAY THIS AMOUNT****\$100,606.47**

*Due Upon Receipt. Please include the invoice number on all remittance. Thank you.*



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Invoice #: 160  
Resp. Atty: LMW  
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**TASK RECAP****Services**

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
B140	28.80	\$29,232.00
B195	13.90	\$7,054.25
B200	62.10	\$63,031.50
	<u>104.80</u>	<u>\$99,317.75</u>

**Disbursements**

<u>Category</u>	<u>Amount</u>
E100 - E109	\$229.48
E100 - E110	\$1,059.24
	\$0.00
	<u>\$1,288.72</u>

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET  
FOR THE PERIOD FROM JUNE 1, 2023 THROUGH JUNE 30, 2023

Debtor: LTL Management LLC Applicant: Randi S. Ellis, FCR  
Case No.: 23-12825-MBK Client: N/A  
Chapter: 11 Case Filed: April 4, 2023 (the "Petition Date")

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SECTION I  
FEE SUMMARY

☒ Monthly Fee Application No. 2 ☐ Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2023 through June 30, 2023.

Total Fees:	\$133,190.00
Total Disbursements:	\$1,861.58
Total Fees Plus Disbursements:	\$135,051.58
Minus 20% Holdback of Fees:	\$26,638.00
<b>Amount Sought at this Time:</b>	<b>\$108,413.58</b>

	<u>FEEs</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	<u>\$79,454.20</u>	<u>\$1,288.72</u>
Total Fees Allowed To Date:	<u>\$0.00</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>N/A</u>	<u>N/A</u>
Total Previous Holdback (If Applicable):	<u>\$19,863.55</u>	<u>\$0</u>
Total Received To Date:	<u>\$79,454.20</u>	<u>\$1,288.72</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
Randi S. Ellis, Legal Representative for Future Talc Claimants	1997	149.9 (includes 19.8 hours of travel time billed at 50%)	\$1015/hr	\$133,190.00

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	41.70	\$42,325.50
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		

SERVICES RENDERED	HOURS	FEE
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	1.50	\$1,522.50
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.		
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	86.90	\$88,203.50
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.		
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		

SERVICES RENDERED	HOURS	FEE
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and brining accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b> Please note that non-working travel time must be billed at 50% of cost.	19.80	\$1,138.50
<b>SERVICE TOTALS:</b>	<b>149.90</b>	<b>\$133,190.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENTS</b>	<b>AMOUNT</b>
a) <b>Filing Fees</b> Payable to Clerk of Court.	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	
d) <b>Fax</b> Include per page fee charged.	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurant.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	\$1,861.58
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	
l) <b>Postage</b>	
m) <b>Other (specify)</b>	
<b>DISBURSEMENTS TOTALS:</b>	<b>\$1,861.58</b>

I certify under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2023

s/Randi S. Ellis

Randi S. Ellis

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23- 12825

Honorable Michael B. Kaplan

**MONTHLY FEE STATEMENT OF RANDI S. ELLIS,  
LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS,  
FOR THE PERIOD JUNE 1, 2023 THROUGH JUNE 30, 2023**

Randi S. Ellis, Legal Representative for Future Talc Claimants (“FCR”) submits this Monthly Fee Statement for Services Rendered and Expenses Incurred as Legal Representative for Future Talc Claimants (the “Statement”) for the period commencing June 1, 2023 and ending June 30, 2023 (the “Statement Period”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [Dkt. No. 562] (the “Interim Compensation Order”). The date of the Order Appointing Randi S. Ellis as FCR is May 18, 2023 [Dkt. No. 551], effective as of April 10, 2023 (the “Appointment Order”). Paragraphs 2 and 5 of the Appointment Order, which is annexed as **Exhibit A**, permit payment of compensation to the FCR incurred on or after April 10, 2023. *See* Exhibit A.

The billing invoice for the Statement Period is annexed hereto as **Exhibit B**. This invoice details the services performed. A detailed breakdown of all out-of-pocket disbursements necessarily incurred by the FCR is included in the invoice annexed as **Exhibit B**. The fees and expense reimbursement sought in the within Statement Period is as follows:

<b>Total Fees</b>	<b>20% Holdback</b>	<b>Fee Payment Requested</b>	<b>Expense Reimbursement (100%)</b>
\$133,190.00	\$26,638.00	\$106,552.00	\$1,861.58



WHEREFORE, the FCR respectfully requests the interim payment of fees for this Statement Period in the sum \$106,552.00 (representing the amount of fees after a 20% holdback), together with expenses of \$1,861.58 for a total requested interim payment of \$108,413.58, in accordance with the terms of the Interim Compensation Order.

I certify under penalty of perjury that the foregoing is true correct.

Executed: July 14, 2023

Respectfully submitted,

*s/Randi S. Ellis*

Randi S. Ellis

*Legal Representative for Future Talc Claimants*

**EXHIBIT A**

Appointment Order



Order Filed on May 18, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050  
pdefilippo@wmd-law.com

**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
Dan B. Prieto, Esq.  
Amanda Rush, Esq.  
2727 N. Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
gmgordon@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted *pro hac vice*)

**PROPOSED ATTORNEYS FOR DEBTOR**

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

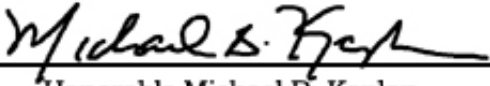
Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**ORDER APPOINTING RANDI S. ELLIS  
AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

The relief set forth on the following pages is hereby **ORDERED**.

**DATED: May 18, 2023**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

(Page 2)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

This matter coming before the Court on the *Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* [Dkt. 87] (the "Motion"),<sup>2</sup> filed by the debtor in the above-captioned case (the "Debtor") pursuant to sections 524(g)(4)(B) and 105(a) of the Bankruptcy Code; the Court having reviewed the Motion, the objections filed by the Official Committee of Talc Claimants [Dkt. 311], Paul Crouch [Dkt. 318], Maune Raichle Hartley French & Mudd, LLC [Dkt. 320], and the United States Trustee [Dkt. 321] (collectively, the "Objections"), the supplemental declaration [Dkt. 354] and amended supplemental declaration filed by Ms. Ellis [Dkt. 415], the Debtor's reply in support of the Motion [Dkt. 355] and the responses to Ms. Ellis' amended supplemental declaration filed by the Official Committee of Talc Claimants [Dkt. 436] and Maune Raichle Hartley French & Mudd, LLC [Dkt. 438], and having heard the statements of counsel and considered the evidence presented with respect to the Motion at a hearing before the Court on May 3, 2023 (the "Hearing"); the Court finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b) and 1334 and the Standing Order of Reference, (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iv) notice of the Motion and the Hearing was sufficient under the circumstances and (v) the relief requested in the Motion is in the best interests of the Debtor, its estate and its creditors; and after due deliberation and for the reasons set forth by the Court on the record during the May 9, 2023 hearing, the Court having overruled the Objections and

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

(Page 3)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED to the extent set forth herein.

2. Pursuant to sections 524(g)(4)(B)(i) and 105(a) of the Bankruptcy Code, Randi S. Ellis is hereby appointed as the Future Claimants' Representative to represent and protect the rights of, absent further order of the Court, natural persons or the representatives of estates of natural persons, including those in Canada or in the United States, that may assert a demand for payment, present or future, that: (a) is not a claim during the proceedings prior to the entry of an order confirming a plan of reorganization (the "Plan"), because such natural person was diagnosed with disease after such time; and (b) arises out of the same or similar conduct or events that gave rise to the claims to be addressed by an injunction issued to enjoin entities from taking legal action for the purpose of directly or indirectly collecting, recovering or receiving payment or recovery with respect to any claim or demand that, under the Plan, is to be paid in whole or in part by a trust established pursuant to section 524(g)(2)(B)(i) and/or 105(a) of the Bankruptcy Code (collectively, the "Future Claimants"). The Future Claimants' Representative shall represent the interests of, appear and act on behalf of, and be a fiduciary to Future Claimants to protect the rights and interests of such Future Claimants and shall be entitled to compensation in connection therewith from the date of the filing of the Motion. Ms. Ellis will have no other obligations except those that may be prescribed by orders of the Court and accepted by Ms. Ellis.

(Page 4)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

3. The Future Claimants' Representative shall be a party in interest in this Chapter 11 Case and shall have standing under section 1109(b) of the Bankruptcy Code to be heard on any issue in this case in the Bankruptcy Court, the District Court or any other court affecting the rights of Future Claimants. The Future Claimants' Representative shall have the powers and duties of a committee set forth in section 1103 of the Bankruptcy Code as are appropriate for a Future Claimants' Representative.

4. In her role as the Future Claimants' Representative, Ms. Ellis may employ attorneys and other professionals consistent with sections 105, 327, and 1103 of the Bankruptcy Code, subject to prior approval of this Court, and such attorneys and other professionals shall be subject to the terms of any Interim Compensation Order.

5. Compensation, including professional fees and reimbursement of actual and necessary expenses, shall be payable to Ms. Ellis and her professionals from the Debtor's estate, as appropriate, subject to approval of this Court, and in accordance with the terms, conditions and procedures set forth in the Interim Compensation Order. In her role as the Future Claimants' Representative, Ms. Ellis shall be compensated at the rate of \$1,015 per hour, subject to periodic adjustment (usually on January 1 of each year) in the ordinary course of her business, plus reimbursement of actual, reasonable and documented out-of-pocket expenses.

6. The Future Claimants' Representative shall not be liable for any damages, or have any obligation other than as prescribed by order of the Court; provided, however, that the Future Claimants' Representative may be liable for damages caused by willful misconduct or gross negligence. The Future Claimants' Representative shall not be liable to any person as a

(Page 5)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

result of any action or omission taken or made in good faith. The Debtor shall indemnify, defend, and hold harmless Ms. Ellis, her employees and professionals (individually an “Indemnified Party”) from all claims against any of them, and all losses, claims, damages or liabilities (or actions in respect thereof) to which any of them may become subject, as a result of or in connection with such party rendering services pursuant to this Order or to the Future Claimants’ Representative, unless and until it is finally judicially determined that such losses, claims, damages or liabilities were caused by willful misconduct or gross negligence on the part of such Indemnified Party. If before the earlier of (i) the entry of an order confirming a plan of reorganization in this case, and such order having become final and no longer subject to appeal, and (ii) the entry of an order closing this Chapter 11 Case, an Indemnified Party believes that he, she or it is entitled to payment of any amount by the Debtor on account of the Debtor’s obligations to indemnify, defend and hold harmless as set forth herein, including, without limitation, the advancement of defense costs, the Indemnified Party must file an application for such amounts with the Court, and the Debtor may not pay any such amounts to the Indemnified Party before the entry of an order by the Court authorizing such payments. The preceding sentence is intended to specify the period of time during which the Court has jurisdiction over the Debtor’s obligations to indemnify, defend and hold harmless as set forth herein, and is not a limitation on the duration of the Debtor’s obligation to indemnify any Indemnified Party. In the event that a cause of action is asserted against any Indemnified Party arising out of or relating to the performance of his, her or its duties pursuant to this Order or to the Future Claimants’ Representative, the Indemnified Party shall have the right to choose his, her or its own counsel.

(Page 6)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

For the avoidance of doubt, gross negligence, willful misconduct, bad faith or fraud on the part of one Indemnified Party shall not preclude indemnification for the other Indemnified Parties.

Any such indemnification shall be an allowed administrative expense under section 503(b) of the Bankruptcy Code and shall be paid upon application to and approval of this Court.

7. Ms. Ellis and any Court-approved counsel retained by Ms. Ellis in her role as Future Claimants' Representative shall be deemed members of the "Core Service List" (or equivalent thereof) for purposes of any Case Management Procedures.

8. Unless otherwise ordered by this Court or as provided for in any confirmed plan of reorganization, Ms. Ellis' appointment as Future Claimants' Representative shall terminate upon the effective date of a plan of reorganization in this Chapter 11 Case or otherwise by written resignation or incapacity to serve.

9. The Debtor shall pay the Future Claimants' Representative Liability Insurance, the cost of which is expected to be approximately \$100,000 per year without further Court approval.

10. The requirement set forth in D.N.J. LBR 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

11. The Debtor is hereby authorized to take all actions it deems necessary to effectuate the relief granted in this Order.

12. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.



**EXHIBIT B**

Time and Expense Invoice

**ATTORNEY AT LAW\***  
(A LIMITED LIABILITY COMPANY)

EMAIL: RANDI@RANDIELLIS.COM

\*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court  
District of New Jersey  
402 East State Street  
Trenton, NJ 08608

July 12, 2023  
Client: 001000  
Matter: 000001  
Invoice #: 173  
Resp. Atty: LMW  
Page: 1

RE: In Re: LTL Management, LLC  
Case No.: 23-12825-MBK  
Judge: Michael B. Kaplan  
Chapter: 11

For Professional Services Rendered Through June 30, 2023

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
6/1/2023	RE	B200	Review TCC letter to the Court regarding Order Granting Application to Shorten Time Regarding Debtor's Motion for Bridge Order Confirming Automatic Stay Applies to Certain Actions (.1); review Christopher Placitella letter regarding Debtor's Application to Shorten Time Regarding Debtor's Motion for Bridge Order (.1); review Agenda and revised agenda for tomorrow's hearing (.1); review Debtor's Motion to Compel the Official Committee of Talc Claimants to Supplement Certain of Its Responses to Interrogatories and Requests for Production (.2); review of Debtor's Omnibus Motion to Compel Identified Plaintiff Firms to Supplement Certain Responses to Debtor's Interrogatories and Requests for Production (.1).	0.6	\$1,015.00	\$609.00
6/2/2023	RE	B140	Attend Hearing with the Court via zoom.	1.8	\$1,015.00	\$1,827.00
6/2/2023	RE	B200	Communications with counsel regarding hearing set for today (.3); review of new filing of Moline Complaint filed in NJ District Court (.4); review of article regarding new Moline Complaint (.1); review of MRHFM's Objection to Debtor's Motion for a Bridge Order (.1); review of TCC Objection to Motion for Bridge Order (.1).	1.0	\$1,015.00	\$1,015.00
6/2/2023	RE	B140	Review and approve Certifications to provide budget (.2); communications with counsel regarding certifications and budgets (.2).	0.4	\$1,015.00	\$406.00

July 12, 2023  
Client: 001000  
Matter: 000001  
Invoice #: 173  
Resp. Atty: LMW  
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## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
6/2/2023	RE	B170	Review of final filed Supplemental Certification of Randi S. Ellis re: US Trustee Large Case Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses (.1); Zoom call with counsel to discuss next steps concerning experts (.6); Additional communications with counsel regarding next steps regarding experts (.2).	0.9	\$1,015.00	\$913.50
6/3/2023	RE	B200	Review of TCC Motion to Compel Dep of Adam Pulaski, of Pulaski Kherkher, PLLC (.1); review of Beasley, Allen, Crow, Methvin, Portis, & Miles, P.C. Opposition to Debtor's Motion to Compel (.1); review of Rule 2019.1 Disclosure of MRHFM (.1).	0.3	\$1,015.00	\$304.50
6/5/2023	RE	B200	Communications with counsel regarding next steps (.2); review of TCC's Motion to Terminate Debtor's Exclusive Period (.2).	0.4	\$1,015.00	\$406.00
6/5/2023	RE	B170	Review of Order Authorizing FTCR's Retention of WPOF.	0.1	\$1,015.00	\$101.50
6/6/2023	RE	B200	Review of US Trustee's Objection to Debtor's Motion for Reimbursement Agreement (.2); review of Notice of Debtors Motion To Extend and Modify the Preliminary Injunction Order and (II) for Confirmation That Successor Liability Actions Are Subject to the Automatic Stay (.3).	0.5	\$1,015.00	\$507.50
6/6/2023	RE	B170	Review of Orders Authorizing Debtor's Retention of AlixPartners, Bates White, and Epiq.	0.1	\$1,015.00	\$101.50
6/7/2023	RE	B200	Review of Text Order on Hearings for Thurs., June 8, 2023 (.1); communications with counsel regarding next steps (.4); TCC's Objection to Debtor's Motion for Reimbursement Agreement (.2); review of Order Partially Granting TCC's Motion to Compel (.1); review of MR Firm's Objection to Debtor's Motion for Expense Agreement (.1).	0.9	\$1,015.00	\$913.50
6/8/2023	RE	B200	Review of emails regarding resolving items on agenda for hearing set for today (.1); communications with counsel regarding next steps (.3); review of Estate of Fleming's Letter on Motion to Dismiss (.1); review of Debtor's Motion to Compel Discovery in LTL v. Moline (.2).	0.7	\$1,015.00	\$710.50

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Client: 001000  
Matter: 000001  
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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
6/11/2023	RE	B200	Review of AHC of Supporting Firms' Response to Debtor's Motion for Reimbursement Agreement (.2); review of Debtor's Reply to Motion for Reimbursement Agreement (.1); review of Notice of Agenda for June 13, 2023 Hearing (.1); review of Joint Letter to Court on Schedule of Filings and Hearing for Certain Matters Involving Cohen, Placitella & Roth, P.C. (.1).	0.5	\$1,015.00	\$507.50
6/12/2023	RE	B200	Communications with counsel regarding next steps (.3); call with counsel to discuss next steps (.5); review of Agenda and matters set for hearing set for tomorrow (.2); Objection of the Ad Hoc Committee of Supporting Counsel to Motion to Terminate the Debtor's Exclusive Period (.2); review of TCC's Designation of Record on Appeal in FCR Appointment Appeal (.2); review of Docket Entry on Bankruptcy Appeal (.1); review of MR Firm's Objection to Debtor's Motion to Modify Preliminary Injunction Order (.1); review of Marlin Eagles' Info Brief for Trial and Exhibits (.2); review of AHC of Supporting Firms' Statement for Debtor's Motion to Extend Injunction Order (.1); research on experts (.8).	2.7	\$1,015.00	\$2,740.50
6/12/2023	RE	B170	Review of Retention Applications for Furgeson and Rave.	0.1	\$1,015.00	\$101.50
6/13/2023	RE	B140	Attend Hearing.	4.4	\$1,015.00	\$4,466.00
6/13/2023	RE	B200	Communications with counsel regarding next steps (.6); communications with counsel and experts (.8); communications with mediator (.4); communications from D. Molten regarding meeting (.1).	1.9	\$1,015.00	\$1,928.50
6/14/2023	RE	B200	Communications with mediator (.6); research on potential experts (1.5); review of Docket Entries on Motion Scheduling and Outcomes (.1); review of Order Granting AHC of Supporting Firms' Motion to Redact and File under Seal (.1).	2.3	\$1,015.00	\$2,334.50
6/15/2023	RE	B200	Review of Cohen Placitella's Opposition to Debtor's Motion to Extend Preliminary Injunction (.4); communications with counsel and experts (.3); research on experts (2.3).	3.0	\$1,015.00	\$3,045.00
6/15/2023	RE	B170	Review of Orders Authorizing TCC's Retention of Hon. Royal Furgeson (Ret.) and Professor Rave as Expert Witnesses.	0.1	\$1,015.00	\$101.50

July 12, 2023  
Client: 001000  
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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
6/16/2023	RE	B200	Prepare for zoom with expert (1.6); Zoom with counsel and expert (1.4); review of AHC of Supporting Firms' Certifications per Order Granting Motion to Intervene (.1); communications from D. Molten regarding meeting (.1); review of Debtor's Reply in Support of Motion to Extend and Modify PI Order and for Confirmation that Successor Liability Actions are Subject to the Automatic Stay (.2).	3.4	\$1,015.00	\$3,451.00
6/17/2023	RE	B200	Continued review of Trust Distribution Procedures (2.3); review of AHC's Law Firms' First Supplemental Verified Statement for Rule 2019 (.6).	2.9	\$1,015.00	\$2,943.50
6/19/2023	RE	B200	Communications with counsel regarding zoom with TCC (.3); communications with counsel regarding experts (.2).	0.5	\$1,015.00	\$507.50
6/20/2023	RE	B200	Communications with counsel regarding expert (.4); review of FTI Statement (.3); Review of Order Authorizing Debtor to Enter Reimbursement Agreement (.1); review of Debtor's Motion to Retain Ordinary Course Professionals (.1); review of Levy Konigsberg's Opposition to Debtor's Motion to Extend Injunction (.2); continued review of Debtor's Reply to Motion to Modify Injunction (.5).	1.6	\$1,015.00	\$1,624.00
6/21/2023	RE	B200	Communications with mediator (.7); review of agenda and filings for matters set for hearing on 6/22/2023 (.5); communications with counsel regarding meetings and next steps (.4); review of Monthly Operating Report (.1); review of Debtor's Motion to Establish Bar Dates (.4); review of TCC's Supplemental Objection to Debtor's Motion to Modify Injunction (.7); review of Memorandum in Opposition to Expedited Discovery filed by Moline (.4); review of Levy Konigsberg's Opposition to Debtor's Motion to Extend Injunction (.2).	3.4	\$1,015.00	\$3,451.00
6/22/2023	RE	B140	Attending Omnibus Hearing.	2.9	\$1,015.00	\$2,943.50
6/22/2023	RE	B200	Communications with counsel and mediators to set meeting (.4); Zoom call with TCC (.6); communications with mediators by phone (1.2); review of rough draft deposition transcript of Judge R. Furgeson (1.5); review of Deposition of J. Onder (2.4); review of Deposition of M. Nachawati (2.8); review of Response to MTD Reply filed by AI (.3); communications with counsel regarding FCR Appointment Appeal (.2).	9.4	\$1,015.00	\$9,541.00

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Client: 001000  
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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
6/23/2023	RE	B200	Attending deposition of S. Birnbaum (3.5); attending deposition of Mullin (4.6); review of Crouch's Motion to Preclude Expert Testimony of Bell and Mullin (.6); review of US Trustee's Reply to Debtor's and AHC of Firms' Objections (.5); review of AHC of States with Consumer Claims' Reply to Dismiss Chapter 11 Case (.5); review of AHC of Meso's Joinder to Motion to Dismiss and TCC's Reply (.1); review of MR Firm's Reply to Dismiss Chapter 11 Case (.9); continuation of review of Arnold & Itkin's Reply to Dismiss Chapter 11 Case and Application to Shorten Time (1.2); emails with mediators and counsel to schedule group call (.3); Communications with Counsel regarding open matters (.4); review of Appellee's Designation of Record in FCR Appointment Appeal (.1).	12.7	\$1,015.00	\$12,890.50
6/24/2023	RE	B200	Review of Notice of Agenda for Dismissal Motion Hearings (.1); review of US Trustee's Reply to Debtor's and AHC of Firms' Objections (.9); communications with Counsel regarding MTD and open matters (.6); review of State of New Mexico and the State of Mississippi's: (I) Memorandum of Law in Reply to Debtor's Omnibus Opposition to Motions to Dismiss Debtor's Second Bankruptcy Petition; (II) Joinder in Replies to Debtor's Opposition by Certain Other Parties; and (III) Statement in Lieu of Opening Argument (.4); review of Evidentiary Stipulation filed by TCC, Ad Hoc of Meso's, Paul Crouch, AHC of States with Consumer Claims, MR Firm, US Trustee, Arnold & Itkin, New Mexico/Mississippi, Debtor, J&J, AHC of Supporting Firms (.3); review of TCC's Reply to Motion to Dismiss Chapter 11 Case (2.5); review of Deposition of J. Kim (2.3).	7.1	\$1,015.00	\$7,206.50
6/25/2023	RE	B200	Review of 5/31/2023 deposition of Adam Lisman (1.5); attending Deposition of Adam Lisman (1.2); review (continued) of TCC's Reply to Motion to Dismiss Chapter 11 Case (1.8); review of Order Partially Granting Debtor's Motion to Compel (.2); communications with counsel regarding Motion to Compel and request for answers from the parties (.2); review of Debtor's Motion to Establish Bar Dates (2.0).	6.9	\$1,015.00	\$7,003.50
6/25/2023	RE	B200	Review of TCC's Reply to Motion to Dismiss Chapter 11 Case.	2.7	\$1,015.00	\$2,740.50

July 12, 2023  
Client: 001000  
Matter: 000001  
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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
6/26/2023	RE	B200	Response by AHC to Replies in Support of MTD (.8); review of Debtor's Exhibit list for MTD hearing (.3); communications with mediator regarding open matters (.2); communications with Counsel regarding MTD and open matters (.3); review of Debtor's Sur Reply to Omnibus Objection to Motions to Dismiss (1.5).	3.1	\$1,015.00	\$3,146.50
6/26/2023	RE	B195	Travel to NJ for MTD Hearing.	12.2	\$57.50	\$701.50
6/26/2023	RE	B170	Review of final filing of Berderson retention application.	0.2	\$1,015.00	\$203.00
6/27/2023	RE	B140	Attend MTD Hearing.	7.9	\$1,015.00	\$8,018.50
6/27/2023	RE	B200	Meetings with counsel before and after MTD hearing (5.6); review of filing regarding Murdica declaration (.2); review of Debtor's response to TCC exhibit list (.1); review of revised agenda and filings regarding continued MTD hearing set for tomorrow (.5); review of MR Firm's Evidentiary Objections (.4).	6.8	\$1,015.00	\$6,902.00
6/28/2023	RE	B140	Attend MTD Hearing.	8.8	\$1,015.00	\$8,932.00
6/28/2023	RE	B200	Meeting with counsel before and after MTD Hearing (3.0); initial Review of Amended Plan and Red-Line (.6); review of Paul Crouch Objection to Charles Mullin Testimony (.2); review of Paul Crouch Motion in Limine to Exclude Evidence of Debtor's Settlement with Third-Party Payors (.3); review of AHC of Supporting Firms' Omnibus Replies to Motions to Dismiss (.3).	4.4	\$1,015.00	\$4,466.00
6/29/2023	RE	B140	Attend MTD Hearing.	8.1	\$1,015.00	\$8,221.50
6/29/2023	RE	B200	Meetings with counsel before and after MTD hearing (2.2); review of Debtor's Letter to J. Kaplan regarding MR's Objections (.2); review of Debtor's Objections to TCC Second Amended Exhibit List (.1); review of Debtor's Response to PC Objection to Mullin proffered testimony (.3); continued Review of Amended Plan and Red-Line (1.6).	4.4	\$1,015.00	\$4,466.00
6/30/2023	RE	B140	Attend MTD Hearing.	7.4	\$1,015.00	\$7,511.00
6/30/2023	RE	B200	Meetings with counsel before and after MTD hearing.	2.8	\$1,015.00	\$2,842.00
6/30/2023	RE	B195	Return travel to Houston after MTD Hearing.	7.6	\$57.50	\$437.00
Total Professional Services				149.9		\$133,190.00

July 12, 2023  
Client: 001000  
Matter: 000001  
Invoice #: 173  
Resp. Atty: LMW  
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#### PERSON RECAP

Person	Hours	Rate	Amount
RE Randi Ellis	19.8	\$57.50	\$1,138.50
RE Randi Ellis	130.1	\$1,015.00	\$132,051.50

#### EXPENSES

Date	Task	Description of Expenses	Amount
6/22/2023	E100 - E110	Airfare - Flight from Houston to NY/NJ 06/26/2023	\$668.60
6/26/2023	E100 - E110	JMS1 Transportation to and from airport 6/26 and 6/30/2023	\$204.00
6/30/2023	E100 - E110	Hotel - 06/26 - 06/30/2023 for MTD Hearings	\$988.98
		Total Expenses	\$1,861.58
		Total Services	\$133,190.00
		Total Disbursements	\$1,861.58
		Total Current Charges	\$135,051.58

**PAY THIS AMOUNT**

**\$135,051.58**

*Due Upon Receipt. Please include the invoice number on all remittance. Thank you.*



TASK RECAP

Services			Disbursements	
Category	Hours	Amount	Category	Amount
B140	41.70	\$42,325.50	E100 - E110	\$1,861.58
B170	1.50	\$1,522.50		\$0.00
B195	19.80	\$1,138.50		\$0.00
B200	86.90	\$88,203.50		\$0.00
	149.90	\$133,190.00		\$1,861.58



Thu, Jun 22, 2023

Thank you for choosing United.

A receipt of your purchase is shown below. Please retain this email receipt for your records.

Confirmation Number:

PDSBX3

Flight 1 of 2 UA2670

Class: United Economy (T)

Mn, Jun 26, 2023

09:35 AM

Houston, TX, US (IAH)

Mon, Jun 26, 2023

02:20 PM

New York/Newark, NJ, US (EWR)

Flight 2 of 2 UA1317

Class: United Economy (V)

Fri, Jun 30, 2023

08:38 PM

New York/Newark, NJ, US (EWR)

Fri, Jun 30, 2023

11:24 PM

Houston, TX, US (IAH)

#### Traveler Details

ELLIS/RANDIS

eTicket number: **0162496521587**

Seats: **IAH-EWR 21A**

#### Purchase Summary

Date of purchase:

**Thu, Jun 22, 2023**

Airfare:	<b>594.23</b>
U.S. Transportation Tax:	<b>44.57</b>
U.S. Flight Segment Tax:	<b>9.60</b>
September 11th Security Fee:	<b>11.20</b>
U.S. Passenger Facility Charge:	<b>9.00</b>

Total Per Passenger:

**668.60 USD**

**Total:**

**668.60 USD**



## JMS1Transportation

Jorge Muniz  
Business Number 832-677-7319  
Jms1transportation@gmail.com

DATE  
Jun 26, 2023

DUE  
On Receipt

BALANCE DUE  
USD \$0.00

### BILL TO

**Randi Ellis**

☎ (225) 803-1413  
Randi@randiellis.com

DESCRIPTION	RATE	QTY	AMOUNT
06/26/2023. Randi Ellis. From Home to IAH ( Airport )	\$85.00	1	\$85.00
06/30/2023. Randi Ellis. From IAH ( Airport ) to Home.	\$85.00	1	\$85.00
SUBTOTAL			\$170.00
GRATUITY (20%)			\$34.00
TOTAL			\$204.00
PAID			-\$204.00
			Jul 1, 2023
BALANCE DUE			USD \$0.00

The Westin Princeton  
201 Village Blvd.  
Princeton, NJ 08540  
United States  
Tel: 1-609-452-7900 Fax: 1-609-452-1223



Randi Ellis  
2141 QUAIL RUN  
BATON ROUGE, LA, 708084127  
United States Of America

Page Number : 1 Invoice Nbr : 1000164104  
Guest Number : 1159284  
Folio ID : A  
Arrive Date : 26-JUN-23 18:01  
Depart Date : 30-JUN-23 07:58  
No. Of Guest : 1  
Room Number : 473  
Marriott Bonvoy Number : 3168

Westin Princet TTNWI JUN-30-2023 08:00 AVERY

Date	Reference	Description	Charges (USD)	Credits (USD)
26-JUN-23	16103	Latitude Lounge	23.19	
26-JUN-23	RT473	Room Chrg - eChannel Retail	219.00	
26-JUN-23	RT473	Room Tax	14.51	
26-JUN-23	RT473	County Tax	6.57	
26-JUN-23	RT473	Occupancy/Tourism	10.95	
27-JUN-23	RT473	Room Chrg - eChannel Retail	239.00	
27-JUN-23	RT473	Room Tax	15.83	
27-JUN-23	RT473	County Tax	7.17	
27-JUN-23	RT473	Occupancy/Tourism	11.95	
28-JUN-23	VI	Visa-1855		-548.17
***For Authorization Purpose Only***				
xxxxxx1855				
Date	Time	Code	Authorized	
26-JUN-23	18:01	03286I	1226.40	
28-JUN-23	RT473	Room Chrg - eChannel Retail	199.00	
28-JUN-23	RT473	Room Tax	13.18	
28-JUN-23	RT473	County Tax	5.97	
28-JUN-23	RT473	Occupancy/Tourism	9.95	

Continued on the next page

The Westin Princeton  
201 Village Blvd.  
Princeton, NJ 08540  
United States  
Tel: 1-609-452-7900 Fax: 1-609-452-1223



Randi Ellis  
2141 QUAIL RUN  
BATON ROUGE, LA, 708084127  
United States Of America

Page Number : 2 Invoice Nbr : 1000164104  
Guest Number : 1159284  
Folio ID : A  
Arrive Date : 26-JUN-23 18:01  
Depart Date : 30-JUN-23 07:58  
No. Of Guest : 1  
Room Number : 473  
Marriott Bonvoy Number : 3168

Date	Reference	Description	Charges (USD)	Credits (USD)
29-JUN-23	16300	Latitude Lounge	18.99	
29-JUN-23	RT473	Room Chrg - eChannel Retail	169.00	
29-JUN-23	RT473	Room Tax	11.20	
29-JUN-23	RT473	County Tax	5.07	
29-JUN-23	RT473	Occupancy/Tourism	8.45	
30-JUN-23	VI	Visa-1855		-440.81

\*\*\*For Authorization Purpose Only\*\*\*

xxxxxx1855

Date	Time	Code	Authorized
28-JUN-23	03:19:15	07355I	486.86
29-JUN-23	03:14:23	02582I	201.20

Approve EMV Receipt for VI - 1855: Signature Captured  
AC:59B6433DEE57ECA5 IAD:06021203A02002 TVR:0080008000  
AID:A0000000031010 AID:A0000000031010 AID-NM:CHASE VISA  
AID:A0000000031010 TSI:E800 ARC:00

\*\* Total 988.98 -988.98  
\*\*\* Balance 0.00

Continued on the next page

The Westin Princeton  
201 Village Blvd.  
Princeton, NJ 08540  
United States  
Tel: 1-609-452-7900 Fax: 1-609-452-1223



Randi Ellis  
2141 QUAIL RUN  
BATON ROUGE, LA, 708084127  
United States Of America

Page Number	:	3	Invoice Nbr	:	1000164104
Guest Number	:	1159284			
Folio ID	:	A			
Arrive Date	:	26-JUN-23	18:01		
Depart Date	:	30-JUN-23	07:58		
No. Of Guest	:	1			
Room Number	:	473			

I agreed to pay all room & incidental charges.

A handwritten signature in blue ink, appearing to be "Randi Ellis", written over a horizontal line.

68

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET  
FOR THE PERIOD FROM JULY 1, 2023 THROUGH JULY 31, 2023

Debtor: LTL Management LLC Applicant: Randi S. Ellis, FCR  
Case No.: 23-12825-MBK Client: N/A  
Chapter: 11 Case Filed: April 4, 2023 (the "Petition Date")

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SECTION I  
FEE SUMMARY

☒ Monthly Fee Application No. 3 ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2023 through July 31, 2023.

Total Fees:	\$142,506.00
Total Disbursements:	\$750.00
Total Fees Plus Disbursements:	\$143,256.00
Minus 20% Holdback of Fees:	\$28,501.20
<b>Amount Sought at this Time:</b>	<b>\$114,754.80</b>

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	<u>\$186,006.20</u>	<u>\$3,150.30</u>
Total Fees Allowed To Date:	<u>\$0.00</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>N/A</u>	<u>N/A</u>
Total Holdback (If Applicable):	<u>\$46,501.55</u>	<u>\$0</u>
Total Received To Date:	<u>\$186,006.20</u>	<u>\$3,150.30</u>

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years Of Professional Service)	HOURS	RATE	FEE
Randi S. Ellis, Legal Representative for Future Talc Claimants	1997	141.1 (includes 1.4 hours of travel time billed at 50%)	\$1015/hr	\$142,506.00

## SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) <b>Asset Analysis and Recovery:</b> Identification and review of potential assets including causes of action and non-litigation recoveries.		
b) <b>Asset Disposition</b> Sales, leases, abandonment and related transaction work.		
c) <b>Avoidance Action Litigation</b> Preference and fraudulent transfer litigation.		
d) <b>Business Operations</b> Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.		
e) <b>Case Administration</b> Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.		
f) <b>Claims Administration and Objections</b> Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.		
g) <b>Employee Benefits/Pensions</b> Review issues such as severance, retention, 401K coverage and continuance of pension plan.		



SERVICES RENDERED	HOURS	FEE
h) <b>Fee/Employment Applications</b> Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	0.20	\$203.00
i) <b>Fee/Employment Objections</b> Review of an objections to the employment and fee applications of others.		
j) <b>Financing</b> Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.		
k) <b>Litigation</b> Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	122.90	\$124,743.50
l) <b>Meetings of Creditors</b> Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.		
m) <b>Plan and Disclosure Statement</b> Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	16.60	\$16,849.00
n) <b>Relief from Stay Proceedings</b> Matters relating to termination or continuation of automatic stay under 362.		
o) <b>Accounting/Auditing</b> Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.		
p) <b>Business Analysis</b> Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.		

SERVICES RENDERED	HOURS	FEE
q) <b>Corporate Finance</b> Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.		
r) <b>Data Analysis</b> Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.		
s) <b>Litigation Consulting</b> Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.		
t) <b>Reconstruction Accounting</b> Reconstructing books and records from past transactions and brining accounting current.		
u) <b>Tax Issues</b> Analysis of tax issues and preparation of state and federal tax returns.		
v) <b>Valuation</b> Appraise or review appraisals of assets.		
w) <b>Travel Time</b> Please note that non-working travel time must be billed at 50% of cost.	1.40	\$710.50
<b>SERVICE TOTALS:</b>	<b>141.10</b>	<b>\$142,506.00</b>

### SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
a) <b>Filing Fees</b> Payable to Clerk of Court.	
b) <b>Computer Assisted Legal Research</b> Westlaw, Lexis and a description of manner calculated.	
c) <b>Pacer Fees</b> Payable to the Pacer Service Center for search and/or print.	
d) <b>Fax</b> Include per page fee charged.	
e) <b>Case Specific Telephone/Conference Call Charges</b> Exclusive of overhead charges.	
f) <b>In-house Reproduction Services</b> Exclusive of overhead charges.	
g) <b>Outside Reproduction Services</b> Including scanning services.	
h) <b>Other Research</b> Title searches, UCC searches, Asset searches, Accurant.	
i) <b>Court Reporting</b> Transcripts.	
j) <b>Travel</b> Mileage, tolls, airfare, parking.	
k) <b>Courier &amp; Express Carriers</b> Overnight and personal delivery.	
l) <b>Postage</b>	
m) <b>Other (specify)</b> Live Streaming	\$750.00
<b>DISBURSEMENTS TOTALS:</b>	<b>\$750.00</b>

I certify under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2023

s/Randi S. Ellis

Randi S. Ellis

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23- 12825

Honorable Michael B. Kaplan

**MONTHLY FEE STATEMENT OF RANDI S. ELLIS,  
LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS,  
FOR THE PERIOD JULY 1, 2023 THROUGH JULY 31, 2023**

Randi S. Ellis, Legal Representative for Future Talc Claimants (“FCR”) submits this Monthly Fee Statement for Services Rendered and Expenses Incurred as Legal Representative for Future Talc Claimants (the “Statement”) for the period commencing July 1, 2023 and ending July 31, 2023 (the “Statement Period”), pursuant to the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [Dkt. No. 562] (the “Interim Compensation Order”), and pursuant to the Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect To Requests For Compensation; And (III) Granting Related Relief [Dkt. No. 1211] (the “Dismissal Order”). The date of the Order Appointing Randi S. Ellis as FCR is May 18, 2023 [Dkt. No. 551], effective as of April 10, 2023 (the “Appointment Order”). Paragraphs 2 and 5 of the Appointment Order, which is annexed as **Exhibit A**, permit payment of compensation to the FCR incurred on or after April 10, 2023. *See* Exhibit A.

The billing invoice for the Statement Period is annexed hereto as **Exhibit B**. This invoice details the services performed. A detailed breakdown of all out-of-pocket disbursements

necessarily incurred by the FCR is included in the invoice annexed as **Exhibit B**. The fees and expense reimbursement sought in the within Statement Period is as follows:

<b>Total Fees</b>	<b>20% Holdback</b>	<b>Fee Payment Requested</b>	<b>Expense Reimbursement (100%)</b>
\$142,506.00	\$28,501.20	\$114,004.80	\$750.00

WHEREFORE, the FCR respectfully requests the interim payment of fees for this Statement Period in the sum \$114,004.80 (representing the amount of fees after a 20% holdback), together with expenses of \$750.00 for a total requested interim payment of \$114,754.80, in accordance with the terms of the Interim Compensation Order.

I certify under penalty of perjury that the foregoing is true correct.

Executed: August 14, 2023

Respectfully submitted,

s/Randi S. Ellis

Randi S. Ellis

*Legal Representative for Future Talc Claimants*

**EXHIBIT A**

Appointment Order



Order Filed on May 18, 2023  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
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**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
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gmgordon@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted *pro hac vice*)

*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

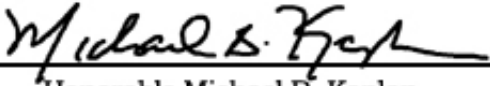
Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**ORDER APPOINTING RANDI S. ELLIS  
AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

The relief set forth on the following pages is hereby **ORDERED**.

**DATED: May 18, 2023**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge



(Page 2)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

This matter coming before the Court on the *Debtor's Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* [Dkt. 87] (the "Motion"),<sup>2</sup> filed by the debtor in the above-captioned case (the "Debtor") pursuant to sections 524(g)(4)(B) and 105(a) of the Bankruptcy Code; the Court having reviewed the Motion, the objections filed by the Official Committee of Talc Claimants [Dkt. 311], Paul Crouch [Dkt. 318], Maune Raichle Hartley French & Mudd, LLC [Dkt. 320], and the United States Trustee [Dkt. 321] (collectively, the "Objections"), the supplemental declaration [Dkt. 354] and amended supplemental declaration filed by Ms. Ellis [Dkt. 415], the Debtor's reply in support of the Motion [Dkt. 355] and the responses to Ms. Ellis' amended supplemental declaration filed by the Official Committee of Talc Claimants [Dkt. 436] and Maune Raichle Hartley French & Mudd, LLC [Dkt. 438], and having heard the statements of counsel and considered the evidence presented with respect to the Motion at a hearing before the Court on May 3, 2023 (the "Hearing"); the Court finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(b) and 1334 and the Standing Order of Reference, (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iv) notice of the Motion and the Hearing was sufficient under the circumstances and (v) the relief requested in the Motion is in the best interests of the Debtor, its estate and its creditors; and after due deliberation and for the reasons set forth by the Court on the record during the May 9, 2023 hearing, the Court having overruled the Objections and

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

(Page 3)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED to the extent set forth herein.

2. Pursuant to sections 524(g)(4)(B)(i) and 105(a) of the Bankruptcy Code, Randi S. Ellis is hereby appointed as the Future Claimants' Representative to represent and protect the rights of, absent further order of the Court, natural persons or the representatives of estates of natural persons, including those in Canada or in the United States, that may assert a demand for payment, present or future, that: (a) is not a claim during the proceedings prior to the entry of an order confirming a plan of reorganization (the "Plan"), because such natural person was diagnosed with disease after such time; and (b) arises out of the same or similar conduct or events that gave rise to the claims to be addressed by an injunction issued to enjoin entities from taking legal action for the purpose of directly or indirectly collecting, recovering or receiving payment or recovery with respect to any claim or demand that, under the Plan, is to be paid in whole or in part by a trust established pursuant to section 524(g)(2)(B)(i) and/or 105(a) of the Bankruptcy Code (collectively, the "Future Claimants"). The Future Claimants' Representative shall represent the interests of, appear and act on behalf of, and be a fiduciary to Future Claimants to protect the rights and interests of such Future Claimants and shall be entitled to compensation in connection therewith from the date of the filing of the Motion. Ms. Ellis will have no other obligations except those that may be prescribed by orders of the Court and accepted by Ms. Ellis.

(Page 4)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

3. The Future Claimants' Representative shall be a party in interest in this Chapter 11 Case and shall have standing under section 1109(b) of the Bankruptcy Code to be heard on any issue in this case in the Bankruptcy Court, the District Court or any other court affecting the rights of Future Claimants. The Future Claimants' Representative shall have the powers and duties of a committee set forth in section 1103 of the Bankruptcy Code as are appropriate for a Future Claimants' Representative.

4. In her role as the Future Claimants' Representative, Ms. Ellis may employ attorneys and other professionals consistent with sections 105, 327, and 1103 of the Bankruptcy Code, subject to prior approval of this Court, and such attorneys and other professionals shall be subject to the terms of any Interim Compensation Order.

5. Compensation, including professional fees and reimbursement of actual and necessary expenses, shall be payable to Ms. Ellis and her professionals from the Debtor's estate, as appropriate, subject to approval of this Court, and in accordance with the terms, conditions and procedures set forth in the Interim Compensation Order. In her role as the Future Claimants' Representative, Ms. Ellis shall be compensated at the rate of \$1,015 per hour, subject to periodic adjustment (usually on January 1 of each year) in the ordinary course of her business, plus reimbursement of actual, reasonable and documented out-of-pocket expenses.

6. The Future Claimants' Representative shall not be liable for any damages, or have any obligation other than as prescribed by order of the Court; provided, however, that the Future Claimants' Representative may be liable for damages caused by willful misconduct or gross negligence. The Future Claimants' Representative shall not be liable to any person as a

(Page 5)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

result of any action or omission taken or made in good faith. The Debtor shall indemnify, defend, and hold harmless Ms. Ellis, her employees and professionals (individually an “Indemnified Party”) from all claims against any of them, and all losses, claims, damages or liabilities (or actions in respect thereof) to which any of them may become subject, as a result of or in connection with such party rendering services pursuant to this Order or to the Future Claimants’ Representative, unless and until it is finally judicially determined that such losses, claims, damages or liabilities were caused by willful misconduct or gross negligence on the part of such Indemnified Party. If before the earlier of (i) the entry of an order confirming a plan of reorganization in this case, and such order having become final and no longer subject to appeal, and (ii) the entry of an order closing this Chapter 11 Case, an Indemnified Party believes that he, she or it is entitled to payment of any amount by the Debtor on account of the Debtor’s obligations to indemnify, defend and hold harmless as set forth herein, including, without limitation, the advancement of defense costs, the Indemnified Party must file an application for such amounts with the Court, and the Debtor may not pay any such amounts to the Indemnified Party before the entry of an order by the Court authorizing such payments. The preceding sentence is intended to specify the period of time during which the Court has jurisdiction over the Debtor’s obligations to indemnify, defend and hold harmless as set forth herein, and is not a limitation on the duration of the Debtor’s obligation to indemnify any Indemnified Party. In the event that a cause of action is asserted against any Indemnified Party arising out of or relating to the performance of his, her or its duties pursuant to this Order or to the Future Claimants’ Representative, the Indemnified Party shall have the right to choose his, her or its own counsel.

(Page 6)

Debtor: LTL Management LLC

Case No. 23-12825 (MBK)

Caption: Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants

For the avoidance of doubt, gross negligence, willful misconduct, bad faith or fraud on the part of one Indemnified Party shall not preclude indemnification for the other Indemnified Parties.

Any such indemnification shall be an allowed administrative expense under section 503(b) of the Bankruptcy Code and shall be paid upon application to and approval of this Court.

7. Ms. Ellis and any Court-approved counsel retained by Ms. Ellis in her role as Future Claimants' Representative shall be deemed members of the "Core Service List" (or equivalent thereof) for purposes of any Case Management Procedures.

8. Unless otherwise ordered by this Court or as provided for in any confirmed plan of reorganization, Ms. Ellis' appointment as Future Claimants' Representative shall terminate upon the effective date of a plan of reorganization in this Chapter 11 Case or otherwise by written resignation or incapacity to serve.

9. The Debtor shall pay the Future Claimants' Representative Liability Insurance, the cost of which is expected to be approximately \$100,000 per year without further Court approval.

10. The requirement set forth in D.N.J. LBR 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

11. The Debtor is hereby authorized to take all actions it deems necessary to effectuate the relief granted in this Order.

12. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

**EXHIBIT B**

Time and Expense Invoice

**ATTORNEY AT LAW\***  
(A LIMITED LIABILITY COMPANY)

EMAIL: RANDI@RANDIELLIS.COM

\*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court  
District of New Jersey  
402 East State Street  
Trenton, NJ 08608

August 14, 2023  
Client: 001000  
Matter: 000001  
Invoice #: 185  
Resp. Atty: LMW  
Page: 1

RE: In Re: LTL Management, LLC  
Case No.: 23-12825-MBK  
Judge: Michael B. Kaplan  
Chapter: 11

For Professional Services Rendered Through July 31, 2023

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/1/2023	RE	B195	Additional return travel to Houston after MTD Hearing.	1.4	\$507.50	\$710.50
7/1/2023	RE	B200	Review of Debtor's Objections to TCC 2nd Amended Exhibit List (.1); Review of Joint Stipulation on Admission of Evidence (.1); Review of TCC's Amended Exhibit List (.1); review of Barnes Law Group's Verified 2019 Statement (.1).	0.4	\$1,015.00	\$406.00
7/2/2023	RE	B230	Review (continued) of Amended Plan Red-Line and TDP (3.6).	3.6	\$1,015.00	\$3,654.00
7/2/2023	RE	B200	Prepare for zoom call set for tomorrow with experts.	2.5	\$1,015.00	\$2,537.50
7/3/2023	RE	B200	Zoom call with counsel and expert (1.6); Communications with counsel regarding experts and filings related to same (.4); Review of materials and links sent to experts (2.8).	4.8	\$1,015.00	\$4,872.00
7/3/2023	RE	B230	Continued Review of Amended Plan and Red-Line and review of TDP.	3.9	\$1,015.00	\$3,958.50
7/5/2023	RE	B200	Communications with counsel regarding experts and next steps (.5).	0.5	\$1,015.00	\$507.50
7/5/2023	RE	B200	Review of Debtor's Motion for Order Extending the Period for Debtor to Remove Actions (.3); Review of TCC's Appeal Brief (.7); Review of Debtor's Motion for Ordinary Course Professionals (.1).	1.1	\$1,015.00	\$1,116.50
7/5/2023	RE	B230	Additional review of amended plan.	3.6	\$1,015.00	\$3,654.00

August 14, 2023

Client: 001000

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Invoice #: 185

Resp. Atty: LMW

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/6/2023	RE	B200	Communications with counsel regarding appeal extension, experts, and next steps.	0.6	\$1,015.00	\$609.00
7/6/2023	RE	B200	Communications with Mediator regarding status and scheduling (.5); Review of TCC Reservation as to Debtor's Removal Period (.2); Review of TCC's Reservation as to Debtor's Motion for Ordinary Course Professional (.2); Research on estimation proceedings and notice (3.1).	4.0	\$1,015.00	\$4,060.00
7/7/2023	RE	B170	Review of Order Authorizing FCR's Retention of Bederson.	0.1	\$1,015.00	\$101.50
7/7/2023	RE	B200	Communications with counsel regarding next steps and open matters (1.4); Communications with mediators scheduling next meeting and discussing mediation status (.6); Research and analyze estimation issues and procedures (2.9).	4.9	\$1,015.00	\$4,973.50
7/10/2023	RE	B200	Review of Complaint filed against Dr. Theresa Swain Emory, Dr. Richard Lawrence Kradin, and Dr. John Coulter Maddox (.3); Communications with mediator regarding status and next steps (.7); Attending live Valadez trial closing arguments (5.4); Communications with counsel regarding Valadez trial (.3); Communications from and to counsel regarding TCC Appeal Letter to J. Shipp (.2); Review of TCC Appeal Letter to J. Shipp (.1).	7.0	\$1,015.00	\$7,105.00
7/11/2023	RE	B200	Analyze Bates White April 2023 Monthly Statement (.3); Prepare for zoom with counsel and Econ One (.5); Attend zoom with counsel and Econ One (.9); Call with counsel regarding next steps (.2).	1.9	\$1,015.00	\$1,928.50
7/11/2023	RE	B200	Research regarding future Talc claims and review of estimates (3.8); Communications with mediator regarding status (.6); Review Debtor's Motion Waiving Proof-of-Claim Requirement, Debtor's Motion to Establish Bar dates/Procedures, AHC of Supporting Firms' Motion to Seal Rule 2019 Statement, and Debtor's Motion to Authorize Retention/Compensation of Ordinary Professionals (.2); Review of Letter Order Extending Briefing Schedule for Appeal Papers (.1); Review of med truth article "Talc Victims Speak Out Against J&J" (.1); Communications with counsel regarding entries regarding analysis of future claims data (.2); Review of Debtor's Motion for Entry of Order Approving Form and Manner of Notice of Hearing on Disclosure Statement, etc. (.7).	5.7	\$1,015.00	\$5,785.50



August 14, 2023

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Resp. Atty: LMW

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/12/2023	RE	B200	Review (continued) of Debtor's Motion for Entry of Order Approving Form and Manner of Notice of Hearing on Disclosure Statement; Approving Disclosure Statement; Establishing Solicitation and Tabulation Procedures; Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form and Manner of Notice; and Granting Related Relief and Exhibits (4.5); Communications with counsel regarding Debtor's filing and next steps (.3); Review of Debtor's Revised Trust Distribution Procedures (1.6); Review of Order Waiving Rule 3003-1(a)(1) Requirement (.1); Review of Order Authorizing Retention of Ordinary Course Professionals (.2).	6.7	\$1,015.00	\$6,800.50
7/13/2023	RE	B200	TCC's Motion Authorizing Estimation and Appointing Ken Feinberg (.4).	0.4	\$1,015.00	\$406.00
7/13/2023	RE	B230	Review of TCC's Motion Establishing Deadline for Proof of Claims and Approving Model Claim Form (.3); Communications with counsel regarding next steps (.6); Review (continued) of Debtor's Revised Trust Distribution Procedures (4.6).	5.5	\$1,015.00	\$5,582.50
7/13/2023	RE	B170	Review of Order Granting Retention of Expert EconOne.	0.1	\$1,015.00	\$101.50
7/14/2023	RE	B200	Review and respond to MR's Motion to Disqualify FCR (2.5); Prepare for zoom with mediators and counsel set for today (.2); Zoom call with counsel to discuss next steps before the call with mediators (.5); Attending zoom with mediators and counsel (.8); Numerous calls and communications regarding response to inquiries concerning MR's Motion to Disqualify FCR (2.8).	6.8	\$1,015.00	\$6,902.00
7/15/2023	RE	B200	Communications with mediator regarding next steps (.4); Review of Order Extending Preliminary Injunction (.3); Review (continued) TCC's Motion Establishing Deadline for Proof of Claims and Approving Model Claim Form (1.5).	2.2	\$1,015.00	\$2,233.00
7/16/2023	RE	B200	Strategy and communications regarding MR Motion to Disqualify FCR.	3.4	\$1,015.00	\$3,451.00
7/17/2023	RE	B200	Zoom call with expert and counsel (.9); Analyze future claims data for additional calls with expert (1.8).	2.7	\$1,015.00	\$2,740.50

August 14, 2023

Client: 001000

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Invoice #: 185

Resp. Atty: LMW

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/17/2023	RE	B200	Review, revise and finalize letter to J. Kaplan regarding MR's Motion to Disqualify FCR (2.3); Review of TCC's Designation of Record on FCR Appointment Appeal to District Court (.1); Review of Docket Entry on Bankruptcy Appeal (.1).	2.5	\$1,015.00	\$2,537.50
7/18/2023	RE	B200	Review MR firm's Reply to Motion to Disqualify (.2); Communications with counsel regarding same (.3); Review responses from attorneys and press on MR Motion to Disqualify FCR (1.5); Review of Valadez jury verdict information (.2); Communications with counsel regarding Valadez jury verdict (.4); Review of Clerk's Quality Control Message on Return Date for Appeal (.1).	2.7	\$1,015.00	\$2,740.50
7/18/2023	RE	B200	Review of documents provided to experts.	2.5	\$1,015.00	\$2,537.50
7/19/2023	RE	B200	Review of Declaration of Shannon Wheatman and other materials provided to and from expert EconOne (2.2); Analyze future claims data for additional calls with expert (2.8); Attend zoom call with experts (.3); Communications with counsel before and after zoom with experts (.2).	5.5	\$1,015.00	\$5,582.50
7/19/2023	RE	B200	Review of Paul Crouch (Levy Konigsberg) Proposed Findings of Fact and Conclusions of Law and Exhibits (2.2); Review of TCC Letter to Kaplan on Debtor's Demand for Certified Plan Directive and Client List and Exhibit (Letter by TCC to Debtor regarding same) (.2); Initial review of Redacted Post-Trial Brief in Support of Motion of Arnold & Itkin, on Behalf of Certain Talc Claimants, To Dismiss Chapter 11 Case (.4).	2.8	\$1,015.00	\$2,842.00
7/20/2023	RE	B200	Review of text order regarding the Motion to Disqualify (.1); Review of MR Firm's Proposed Findings of Fact and Conclusions of Law to Motion to Dismiss (1.5); Review of New Mexico and Mississippi's Post-Hearing Memorandum to Motion to Dismiss (.4); Review of AHC of Meso's Proposed Findings of Fact and Conclusions of Law to Motion to Dismiss (.1); Review of AHC of States with Consumer Claims' Findings of Fact and Conclusions of Law (.1); Analyze conclusions of law (2.9).	5.1	\$1,015.00	\$5,176.50

August 14, 2023

Client: 001000

Matter: 000001

Invoice #: 185

Resp. Atty: LMW

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/21/2023	RE	B200	Review of Jones Day Letter to Kaplan on Plan Solicitation Directive (.1); Review of TCC's Letter Claiming Unlawful Solicitation by Debtor (.1); Communications with counsel regarding filings and next steps (.3); Communications with mediator regarding next steps (.5); Review of TCC's Notice of Appeal and Statement of Election (.1); Review of TCC's Findings of Fact and Conclusions of Law to Motion to Dismiss (2.7); Review of US Trustee's Proposed Findings of Fact and Conclusions of Law to Motion to Dismiss (.1).	3.9	\$1,015.00	\$3,958.50
7/22/2023	RE	B200	Communications with counsel regarding meeting with expert.	0.2	\$1,015.00	\$203.00
7/22/2023	RE	B200	Analyze filed proposed findings of fact.	3.2	\$1,015.00	\$3,248.00
7/23/2023	RE	B200	Review of MR Firm's Letter on Debtor's Solicitation Directive (.1); Review of Debtor's Monthly Operating Report for June 2023 (.1); Continued analysis of findings of fact and conclusions of law (4.6).	4.8	\$1,015.00	\$4,872.00
7/24/2023	RE	B200	Communications with counsel regarding next steps and meeting with expert.	0.8	\$1,015.00	\$812.00
7/24/2023	RE	B200	Communications with mediator (.7); analyze Fourth Circuit June 20, 2023 decision in Bestwall regarding appellate standing of FCR (.3); Continued review of TCC Findings of Fact and Conclusions of Law (2.2); Review of Order granting adjournment of TCC's Motions Authorizing an Estimation of Current Talc Claims for Voting Purposes, (II) Appointing Kenneth R. Feinberg as Expert Pursuant to Federal Rule of Evidence 706, and (III) Establishing Procedures and Schedule for Estimation Proceedings (.2); Review of Joint Stipulation and Agreement Order regarding admission of Exhibits and Deposition designations in connection with the MTD (.1); Emails from and to F. Yook regarding ECF Nos. 3949 and 3951 (.1).	3.6	\$1,015.00	\$3,654.00
7/25/2023	RE	B200	Email from F. Yook regarding ECF Nos. 3949 and 3951 (.1); Review of ECF Nos. 3849 and 3951 set for August 2, 2023 regarding Motions for Allowance for Substantial Contribution TCC and AWKO (1.4); Review findings and reports in other Talc BKs related to LTL (1.8); Reviewed trial testimony from Emory Valadez trial (3.5); Communications with counsel regarding next steps and meeting with expert (.3).	7.1	\$1,015.00	\$7,206.50

August 14, 2023

Client: 001000

Matter: 000001

Invoice #: 185

Resp. Atty: LMW

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/26/2023	RE	B200	Communications with counsel regarding next steps and meeting with expert.	0.5	\$1,015.00	\$507.50
7/26/2023	RE	B200	Review of AHC of Supporting Firms' Objection to MR Firm's Motion to Disqualify FCR (.1); Review of Debtor's Objection to MR's Motion to Disqualify FCR (.2); Review of Debtor's Objection to Motions for Allowance of Substantial Contribution (.4); Reviewed trial testimony of plaintiff's experts from Emory Valadez trial (5.6).	6.3	\$1,015.00	\$6,394.50
7/27/2023	RE	B200	Pre zoom call with counsel to prepare for call with experts (.3); Zoom with counsel and experts regarding data and analysis (1.6); Call with counsel after zoom with expert (.3).	2.2	\$1,015.00	\$2,233.00
7/27/2023	RE	B200	Reviewed defendants' expert trial testimony from Emory Valadez trial.	4.9	\$1,015.00	\$4,973.50
7/28/2023	RE	B200	Communications with counsel in preparation for expert zoom today (.6); Attend zoom with counsel and expert (.6); Follow up calls with counsel regarding next steps with experts and data/document requests (.3).	1.5	\$1,015.00	\$1,522.50
7/28/2023	RE	B200	Review of Motion to Dismiss ruling (1.7); Communications with counsel regarding same (.5); Communications with other parties regarding MTD ruling (2.8).	5.0	\$1,015.00	\$5,075.00
7/29/2023	RE	B200	Communications with parties regarding Ruling on MTD and next steps.	1.8	\$1,015.00	\$1,827.00
7/31/2023	RE	B200	Review of August 2, 2023, Hearing Agenda (.2); Review of Order denying Motion to Disqualify FCR (.1); Communications with counsel regarding Order and Agenda (.1).	0.4	\$1,015.00	\$406.00
Total Professional Services				141.1		\$142,506.00

**PERSON RECAP**

Person	Hours	Rate	Amount
RE Randi Ellis	1.4	\$507.50	\$710.50
RE Randi Ellis	139.7	\$1,015.00	\$141,795.50

**EXPENSES**

Date	Task	Description of Expenses	Amount
7/10/2023	E100 - E106	CVN Invoice - watch live stream of Valdez trial closing	\$750.00

EXPENSES

Date	Task	Description of Expenses	Amount
		Total Expenses	\$750.00
		Total Services	\$142,506.00
		Total Disbursements	\$750.00
		Total Current Charges	\$143,256.00
		Previous Balance	\$239,493.55
		Less Payments	(\$80,742.92)
		Less Retainer Applied	(\$80.00)
		PAY THIS AMOUNT	\$301,926.63

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.

TASK RECAP

Services			Disbursements	
Category	Hours	Amount	Category	Amount
B170	0.20	\$203.00	E100 - E106	\$750.00
B195	1.40	\$710.50		\$0.00
B200	122.90	\$124,743.50		\$0.00
B230	16.60	\$16,849.00		\$0.00
	141.10	\$142,506.00		\$750.00

ERANDI S. PETERS  
 ATTORNEY AT LAW\*  
 (A LIMITED LIABILITY COMPANY)

EMAIL: RANDI@RANDIELLIS.COM

\*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court  
 District of New Jersey  
 402 East State Street  
 Trenton, NJ 08608

August 15, 2023  
 Client: 001000  
 Matter: 000001  
 Invoice #: 186  
 Resp. Atty: LMW  
 Page: 1

RE: In Re: LTL Management, LLC  
 Case No.: 23-12825-MBK  
 Judge: Michael B. Kaplan  
 Chapter: 11

For Professional Services Rendered Through August 15, 2023

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
8/1/2023	RE	B200	Communications regarding Order on Motion to Disqualify (.3); Communications regarding August 2, 2023 hearing (.4).	0.7	\$1,015.00	\$710.50
8/2/2023	RE	B140	Attending August 2 Hearing.	1.9	\$1,015.00	\$1,928.50
8/2/2023	RE	B200	Review of letter from TCC to J. Kaplan regarding dismissal order and next steps (.1) Communications with counsel regarding August 2, 2023 hearing and next steps (.4); Review emails regarding hearing and next steps (.3).	0.8	\$1,015.00	\$812.00
8/3/2023	RE	B200	Review and analyze draft dismissal order (.7); Communications with counsel regarding press concerning disqualification motion and responsive statement (.3); Communications with counsel regarding dismissal (.2).	1.2	\$1,015.00	\$1,218.00
8/4/2023	RE	B200	Communications with counsel regarding revisions to draft dismissal (.5); Review revisions to draft dismissal order (.3); Communications with non-parties regarding Order on Motion to Disqualify FCR (.6).	1.4	\$1,015.00	\$1,421.00
8/5/2023	RE	B200	Review additional revisions draft dismissal order.	0.4	\$1,015.00	\$406.00
8/7/2023	RE	B200	Communications with counsel regarding dismissal, appeal, and open matters (.8); Review of dismissal submissions by all parties (.2); Review dismissal filing (.1); Call with counsel regarding FCR appeal and the dismissal (.5).	1.6	\$1,015.00	\$1,624.00

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## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
8/7/2023	RE	B170	Communications with counsel and experts regarding case dismissal and final activity.	0.3	\$1,015.00	\$304.50
8/8/2023	RE	B200	Review of Court's final dismissal order and debtor's letter to J. Kaplan regarding same (.9); Review of MR Firm's Letter to Kaplan on Dismissal Order, US Trustee's Letter to Kaplan on Dismissal Order, Paul Crouch Submission on Dismissal Order, TCC's Letter to Kaplan on Dismissal Order, AHC of Supporting Firms' Letter to Kaplan on Dismissal Order, and New Mexico and Mississippi's Letter to Kaplan on Dismissal Order (1.0).	1.9	\$1,015.00	\$1,928.50
8/9/2023	RE	B200	Review of response letter filed by LTL regarding TCC continuing after the dismissal.	0.1	\$1,015.00	\$101.50
8/10/2023	RE	B200	Communications with counsel regarding status of dismissal and final zoom call set for tomorrow.	0.2	\$1,015.00	\$203.00
8/11/2023	RE	B200	Call with expert and counsel to discuss dismissal and next steps.	0.3	\$1,015.00	\$304.50
8/11/2023	RE	B200	Review of final signed dismissal order and closing file (.5); Communications with counsel regarding dismissal and final invoice (.6).	1.1	\$1,015.00	\$1,116.50
Total Professional Services				11.9		\$12,078.50

## PERSON RECAP

Person	Hours	Rate	Amount
RE Randi Ellis	11.9	\$1,015.00	\$12,078.50

Total Services	\$12,078.50
Total Disbursements	\$0.00
Total Current Charges	\$12,078.50
Previous Balance	\$301,926.63
<b>PAY THIS AMOUNT</b>	<b>\$314,005.13</b>

*Due Upon Receipt. Please include the invoice number on all remittance. Thank you.*



TASK RECAP

Services			Disbursements	
Category	Hours	Amount	Category	Amount
B140	1.90	\$1,928.50		\$0.00
B170	0.30	\$304.50		\$0.00
B200	9.70	\$9,845.50		\$0.00
	11.90	\$12,078.50		\$0.00